

**FCC RM-10787**  
**Comments of the Charles Young**

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of	)	
	)	
Petition for Rule NCVEC	)	RM-10787
Proposed Amendment of	)	
Part 97 to remove	)	
Telegraphy Requirement	)	

To: The Commission

COMMENTS OF Charles Young, IN RESPONSE TO PETITION FOR RULE  
MAKING

Pursuant to Section 1.405(a) of the Commission's Rules [47 C.F.R. §1.405(a)] Charles Young hereby respectfully submits his comments in response to the so called Petition for Rule Making (the Petition) RM-10787 filed by NCVEC for the purpose of removing Telegraphy as a test requirement for the Amateur Radio Service

In filing the petition, NCVEC stated:

*“Pursuant to Section 1.405 of the Commission's procedural rules (47 C.F.R. §1.405), the NCVEC hereby respectfully requests that the Commission issue a Notice of Proposed Rule Making at an early date looking toward amendment of the rules governing the Amateur Radio Service, 47 C.F.R. §97.1 et seq., as set forth herein and in the attached Appendix.”*

Charles Young hereby requests that the Commission **REJECT** the NCVEC Petition on grounds of procedure. The NCVEC attempts to file a Petition for Rulemaking under 47 CFR 1.405. By doing so, the Petition becomes a comment and thus cannot be accepted as a petition. Since the Commission had not opened any petitions for Comment at the time the NCVEC document was filed, it should be rejected as a petition and rejected as a comment.

Respectfully submitted,

(Electronically signed, Charles Young)

Charles Young  
13805 Timbercreek Drive  
Cantonment, Florida 32533  
ARS: AG4YO